

# EXHIBIT A

**MONTANA EIGHTH JUDICIAL DISTRICT, CASCADE COUNTY MONTANA**

CHRISTOPHER LEE KOHLMAN, ) Cause. No. BDV 20-0664  
Plaintiff, )  
vs. ) ELIZABETH A. BEST  
AUTOZONE AUTO PARTS GREAT FALLS )  
#3770, D/B/A AUTOZONE AUTO PARTS )  
Defendant. )  
)

**THE STATE OF MONTANA SENDS GREETINGS TO: AUTOZONE GREAT FALLS  
#3770, D/B/A AUTOZONE AUTO PARTS**

You are hereby summoned to respond to the **Complaint and Demand for Jury Trial**

which is filed in the Office of the Clerk of this Court, a copy of which is, herewith, served upon you  
and to file your response and serve a copy, thereof, upon the Plaintiff within twenty-one (21) days  
after the service of this Summons, exclusive of the day of service; and in case of your failure to  
respond, Judgment will be entered against you by default for the arrangements requested for in the  
Complaint and Demand for Jury Trial.

Dated this 7<sup>th</sup> day of December, 2020.



(COURT OF SEAL)

CLERK OF COURT

DEPUTY CLERK

*Elizabeth Best*

1 Patrick F. Flaherty  
2 FLAHERTY GALLARDO LAWYERS  
3 1026 First Ave. South  
4 P.O. Box 1968  
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Phone: (406) 727-8494  
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FILED

BY \_\_\_\_\_

Attorney for Plaintiff

**MONTANA EIGHTH JUDICIAL DISTRICT, CASCADE COUNTY MONTANA**

8 CHRISTOPHER LEE KOHLMAN,  
9 Plaintiff,  
10 vs.  
11 AUTOZONE AUTO PARTS GREAT FALLS  
#3770, D/B/A AUTOZONE AUTO PARTS  
12 Defendant.

) Cause. No.

**BDV 20-0667**

**ELIZABETH A. BEST**

**COMPLAINT  
AND JURY DEMAND**

**COMPLAINT FOR WRONGFUL TERMINATION OF EMPLOYMENT**

**PARTIES**

16 1. At all times pertinent hereto, plaintiff was a resident of Cascade County in  
Montana.

18 2. At all times pertinent hereto Defendant was a registered corporation organized  
under the laws of the State of Montana. Its principal place of business is located at 10<sup>th</sup> Avenue  
20 South, Great Falls, Montana 59405.

21 3. Jurisdiction and venue are proper in this court.

**FACTUAL ASSERTIONS**

23 4. Christopher Lee Kohlman began working for the Defendant, AutoZone Great Falls  
25 #3770, D/B/A AutoZone Auto Parts in November 2017. He was a good employee who  
27 performed his job to the best of her ability for the 2 1/2 years he was employed.

- 1 5. Christopher had no prior write-ups and he covered shifts for other employees.
- 2 6. Christopher was terminated November 9, 2020 without good cause.
- 3 7. The termination was not for good cause and was in violation of applicable laws.
- 4 8. Christopher has been damaged by the Defendant.

5 **COUNT ONE: WRONGFUL DISCHARGE FROM EMPLOYMENT**

6 9. The Plaintiff incorporates Paragraphs 1 through 8 by reference as if fully  
7 incorporated.

8 10. Plaintiff performed his job satisfactorily and passed his probationary period of  
9 employment.

10 11. The Defendant discharged the Plaintiff without good cause and in violation of  
applicable state law, and policies of the Defendant.

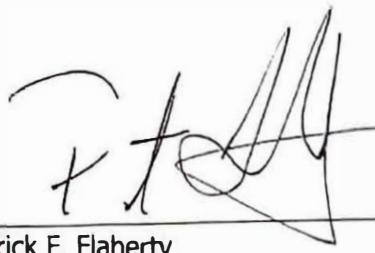
12 13. The Defendant violated the Montana Wrongful Discharge from Employment Act  
(WDEA) causing Plaintiff to suffer loss of wages and benefits. Defendant's conduct in firing  
14 Plaintiff was malicious within the meaning of §27 -1- 220, 221 MCA.

15 16. The Defendant is liable to the Plaintiff for all damages caused by its misconduct.  
**PRAYER FOR RELIEF**

17 WHEREFORE, the Plaintiff prays that he have and recover judgment against the  
18 Defendant.

19 20 21 22 23 24 1. For the recovery of all compensatory damages necessary to make her whole.  
2. For punitive damages.  
3. For costs, fees and such further relief as the Court deems just and proper  
including permission to amend the pleadings.

DATED this 1 day of December, 2020.

  
\_\_\_\_\_  
Patrick F. Flaherty  
Attorney for the Plaintiff

**JURY DEMAND**

Pursuant to MRCP 38 the plaintiff demands a trial by jury.

DATED this 1 day of December, 2020.

  
\_\_\_\_\_  
Patrick F. Flaherty  
Attorney for the Plaintiff